FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Exopack, LLC
2200 D Avenue East
Seymour, Indiana 47274

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F071-9061-00028	
Issued by: Paul Dubenetzky, Branch Chief, Office of Air Quality	Issuance Date: March 25, 1998 Expiration Date: March 25, 2003

First Administrative Amendment 071-11219-00028, issued September 29, 1999
Second Administrative Amendment 071-14459-00028, issued August 21, 2001
Third Administrative Amendment 071-14953-00028, issued October 10, 2001
Fourth Administrative Amendment 071-15657-00028, not yet issued.

1st Significant Permit Revision No.: 071-15347-00028	Pages Affected: 26, and 33
Issued by:Original signed by Paul Dubenetzky, Branch Chief, Office of Air Quality	Issuance Date: May 29, 2002

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) Flexoline 8 color flexographic printing press, constructed in 1986, identified as PS1, with a maximum line speed of 1200 feet per minute on ink or 400 feet per minute for ink and varnish, exhausting to one (1) stack (S2) and two (2) vents (V3 and V4).

(b) One (1) Flexoline 4 color flexographic printing press, constructed in 1988, identified as PS2, with a maximum line speed of 1100 feet per minute, exhausting to two (2) vents (V5 and V6);

(c) One (1) Union Camp 2 color flexographic printing press, constructed in 1996, identified as PS3, with a maximum line speed of 500 feet per minute; and

(d) One (1) Advance Machine Technology one color flexographic printing press, constructed in 1989, identified as PS4, with a maximum line speed of 500 feet per minute.

(e) One (1) two-color, flexographic, "tail-end" printing press, identified as PS5, maximum capacities of 155 lb/hr inks and varnishes and 44,700 square inches of paper per hour, emissions uncontrolled, and exhausting to vent V5; and

(f) One (1) portable, two-color, flexographic, "tail-end" printing press, identified as PS6, maximum capacities of 155 lb/hr inks and varnishes and 44,700 square inches of paper per hour, emissions uncontrolled, and exhausting to vent V6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP), the volatile organic compound (VOC) in the inks and varnishes applied to the six (6) flexographic printing presses (PS1 through PS6) shall not exceed ninety-nine (99) tons per twelve consecutive month period.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the ink as it is applied to the substrate less water, shall contain sixty percent (60%) by volume or more nonvo latile material.

D.1.3 Hazardous Air Pollutant (HAP) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP), the six (6) flexographic printing presses (PS1 through PS6) are limited to ten (10) tons of any single hazardous air pollutant (HAP) emissions per twelve consecutive month period and twenty-five (25) tons of any combination of hazardous air pollutants (HAP) emissions per twelve consecutive month period.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(1)]

Testing of these facilities are not specifically required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) and hazardous air pollutant (HAP) limits specified in Conditions D.1.1, D.1.2 and D.1.3 shall be determined by a performance test.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Exopack, LLC
Source Address: 2200 D Avenue East, Seymour, Indiana 47274
Mailing Address: 2200 D Avenue East, Seymour, Indiana 47274
FESOP No.: F071-9061-00028
Facility: six (6) flexographic printing presses (PS1 through PS6)
Parameter: volatile organic compounds (VOC) and hazardous air pollutants (HAP)
Limit: 8.25 tons VOC per month = 16,500 pounds VOC per month; 0.83 tons HAP per month = 1,666 pounds HAP per month
YEAR: _____

Month	Coating Identi-fication	Coating usage (gal)	HAP content (lbs/gal)	Pounds HAP per month (Coating usage * HAP content)	Total pounds HAP per month	VOC content (lbs/gal)	Pounds VOC per month (Coating usage * VOC content)	Total pounds VOC per month

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

May 29, 2002

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Exopack, LLC
Source Location:	2200 D Avenue East, Freemen Field, Seymour, IN 47274
County:	Jackson
SIC Code:	2674
Operation Permit No.:	F071-9061-00028
Operation Permit Issuance Date:	March 26, 1998
Permit Revision No.:	071-15347-00028
Permit Reviewer:	ERG/BS

The Office of Air Quality (OAQ) has reviewed the request for a revision to a FESOP (F071-9061-00028) to adjust the emissions cap of the source to less than ninety-nine (99) tons VOC per year, less than ten (10) tons of a single HAP per year, and less than twenty-five (25) tons of any combination of HAPs per year. The FESOP previously limited the source to less than ninety-eight (98) tons VOC per year, less than nine and four-tenths (9.4) tons of a single HAP per year, and less than twenty-four (24) tons of any combination of HAPs per year.

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) Flexoline 8 color flexographic printing press, constructed in 1986, identified as PS1, with a maximum line speed of 1200 feet per minute on ink or 400 feet per minute for ink and varnish, exhausting to one (1) stack (S2) and two (2) vents (V3 and V4);

(b) One (1) Flexoline 4 color flexographic printing press, constructed in 1988, identified as PS2, with a maximum line speed of 1100 feet per minute, exhausting to two (2) vents (V5 and V6);

(c) One (1) Union Camp 2 color flexographic printing press, constructed in 1996, identified as PS3, with a maximum line speed of 500 feet per minute;

(d) One (1) Advance Machine Technology one color flexographic printing press, constructed in 1989, identified as PS4, with a maximum line speed of 500 feet per minute;

(e) One (1) two-color, flexographic, “tail-end” printing press, identified as PS5, maximum capacities of 155 lb/hr inks and varnishes and 44,700 square inches of paper per hour, emissions uncontrolled, and exhausting to vent V5; and

(f) One (1) portable, two-color, flexographic, “tail-end” printing press, identified as PS6, maximum capacities of 155 lb/hr inks and varnishes and 44,700 square inches of paper per hour, emissions uncontrolled, and exhausting to vent V6.

History

Union Camp Corporation was issued a FESOP (F071-9061-00028) on March 26, 1998. Ownership of the source, after a merger with International Paper Company, was transferred September 29, 1999; at which time the source was identified as the International Paper - Seymour Flexible Packaging Plant. On July 31, 2001, the source received an amendment signifying another change in ownership. On September 14, 2001, a request to change the source's name and responsible official was received. The name of the company was changed on the FESOP from FPD Acquisition, Inc at 2200 D Avenue East, Seymour, Indiana to Exopack, LLC at the same address. On December 27, 2001, Exopack, LLC submitted an application to the OAQ requesting to add two printing presses to their existing plant and requesting a change in the emissions cap. The addition of the two presses has been documented through an administrative amendment (AA 071-15657-00028). With the recent addition of two new presses, the source requests that the FESOP indicate all of the permissible VOC emissions allowed by a FESOP.

Existing Approvals

The source was issued a FESOP (F071-9061-00028) on March 26, 1998. The source has since received the following:

(a) First Administrative Amendment No.: AA 071-11219-00028, issued on September 29, 1999;

(b) Second Administrative Amendment No.: AA 071-14459-00028, issued on July 31, 2001; and

(c) Third Administrative Amendment No.: AA 071-14953-00028, issued on October 10, 2001;

(c) Fourth Administrative Amendment No.: AA 071-15657-00028; not yet issued.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 27, 2001.

Emission Calculations

No emission calculations have been completed since this permit revision documents a change in the permissible emissions from the source.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical

or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO_2	-
VOC	greater than 100
CO	-
NO_x	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
2-Butoxyethanol	0.14
TOTAL	0.14

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. However, the source has agreed to limit VOC to less than 100 tons per twelve consecutive month period. Therefore, rule 326 IAC 2-8 will apply.

Justification for Revision

The FESOP is being revised through a significant permit revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(g)(2) as the VOC and HAP emissions caps for the source have been increased to the allowable limits.

Potential to Emit After Issuance

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Six Flexographic printing presses (PS1 through PS6)	0	0	0	less than 99[(a)]	0	0	9.4
Insignificant Activities (existing)	0	0	0	1.0	0	0	0
Total Emissions	0	0	0	less than 100	0	0	9.4

(a) In order to comply with the requirements of 326 IAC 2-8, the six (6) Flexographic printing presses (PS1 through PS6) are limited, in aggregate, to less than 99 tons VOC input per twelve consecutive month period. Prior to this revision, presses PS1 through PS6 were limited to 98 tons VOC per year.

County Attainment Status

The source is located in Jackson County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Jackson County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) The six flexographic printing presses (PS1 through PS6) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ), because the presses are flexographic rather than rotogravure.

(b) The six flexographic printing presses (PS1 through PS6) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart KK because they are not major sources of hazardous air pollutants. However, they are subject to the requirements of 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

(1) Pursuant to 40 CFR 63.829(d), the Permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing material used, on a monthly basis.

(2) Pursuant to 40 CFR 63.830(b)(1), the Permittee shall submit an initial notification required in 40 CFR 63.9(b).

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Jackson County and the potential to emit VOC is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Six Flexographic Printing Presses (PS1 through PS6)

326 IAC 2-8 (FESOP)

The volatile organic compound (VOC) in the inks and varnishes applied by the six (6) flexographic printing presses (PS1 through PS6) shall not exceed ninety-nine (99) tons of volatile organic compounds (VOC) per twelve consecutive month period, ten (10) tons of a single hazardous air pollutant (HAP) per twelve consecutive month period, and twenty-five (25) tons of a combination of hazardous air pollutants (HAP) per twelve consecutive month period. Compliance with this limit satisfies the requirements of 326 IAC 2-8 and renders the requirements of 326 IAC 2-7 not applicable.

326 IAC 8-1-6 (General Reduction Requirement)

The six (6) flexographic printing presses (PS1 through PS6) are not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because they are subject to another provision of 326 IAC 8, specifically 326 IAC 8-5-5 (Graphic Arts Operations).

326 IAC 8-5-5 (Graphic Arts Operations)

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the ink as it is applied to the substrate, less water, for the six (6) flexographic printing presses (PS1 through PS6) shall contain sixty percent (60%) by volume or more nonvolatile material. Based on the Material Safety Data Sheets (MSDS) and Certified Product Data Sheets (CPDS) and calculations submitted by the source, the six (6) flexographic printing presses are in compliance with this requirement.

Testing Requirements

No testing of the flexographic printing presses is required because they are sources of VOC emissions that do not use VOC control and each account for less than forty percent (40%) of the source's potential to emit.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. Monitoring of the flexographic printing presses is not specifically required by the attached FESOP. However, the presses do have applicable record keeping conditions as specified below:

    (a) To document compliance with 326 IAC 2-8 and 326 IAC 8-5-5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to

establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits pursuant to 326 IAC 2-8 and 326 IAC 8-5-5.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and either Certified Product Data Sheets (CPDS) or material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC and HAP content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC and HAP usage for each month; and

(6) The weight of VOCs and HAPs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Proposed Changes

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP), the volatile organic compound (VOC) in the inks and varnishes applied to the six (6) flexographic printing presses (PS1 through PS6) shall not exceed ~~ninety-eight (98)~~ **ninety-nine (99)** tons per ~~year~~ **twelve consecutive month period**.

D.1.3 Hazardous Air Pollutant (HAP) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP), the six (6) flexographic printing presses (PS1, PS2, PS3, PS4, PS5, and PS6) are limited to ~~nine and four-tenths (9.4)~~ **ten (10)** tons of any single hazardous air pollutant (HAP) emissions per ~~year~~ **twelve consecutive month period** and ~~twenty-four (24)~~ **twenty-five (25)** tons of any combination of hazardous air pollutants (HAP) emissions per ~~year~~ **twelve consecutive month period**.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Exopack, LLC
Source Address: 2200 D Avenue East, Seymour, Indiana 47274
Mailing Address: 2200 D Avenue East, Seymour, Indiana 47274
FESOP No.: F071-9061-00028
Facility: six (6) flexographic printing presses (PS1 through PS6)
Parameter: volatile organic compounds (VOC) and hazardous air pollutants (HAP)
Limit: ~~8.16~~ **8.25** tons VOC per month = ~~16,320~~ **16,500** pounds VOC per month; ~~0.78~~ **0.83** tons HAP per month = ~~1,560~~ **1,666** pounds HAP per month

YEAR: _____

Month	Coating Identi-fication	Coating usage (gal)	HAP content (lbs/gal)	Pounds HAP per month (Coating usage * HAP content)	Total pounds HAP per month	VOC content (lbs/gal)	Pounds VOC per month (Coating usage * VOC content)	Total pounds VOC per month

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Conclusion

This permit revision shall be subject to the conditions of the attached FESOP Significant Permit Revision No. F071-15347-00028.

Appendix A: Emissions Calculations
VOC, HAP and PM from Printing Press Operations
Ink and Solvent Usage
Company Name: Exopack, LLC
Address City IN Zip: 2200 D Avenue East, Freemen Field, Seymour, IN 47274
Permit #: 071-15347-00028
Reviewer: ERG/BS
Date: January 23, 2001

Emission Unit ID	Material in Resin or Gel	Maximum Coverage Area (lb ink/ MM in^2)	Weight % VOC	Maximum Line Speed (inches/min)	Maximum Press Width (inches)	Operating Schedule (hr/yr)	Potential Throughput (MM in^2/yr)	**Potential VOC/HAP (tons per year)**	Transfer Efficiency*	**Potential PM (tons per year)**
Two-color Flexographic Printing Press (PS5)	worst case VOC ink	6.944	12.07%	6000.00	62.000	8760	195523.20	81.94	100%	0.00
	(includes additives)									
Two-color Flexographic Printing Press (PS6)	worst case VOC ink	6.944	12.07%	6000.00	62.000	8760	195523.20	81.94	100%	0.00
	(includes additives)									
					Total VOC and PM from Coating Ops			**163.88**		**0.00**

* It is assumed that no PM is generated from the printing process

Emission Unit ID	Material in Resin or Gel	Density (Lb/Gal)	Weight % VOC	Weight % HAP	Potential Usage (gal/month)**		**Potential VOC (tons per year)*** **	**Potential HAP (tons per year)*** **
Clean-Up solvent	Solvent	8.44	7.00%	5.00%	55		0.19	0.14
Chemstation Internation P 7170								
						Total VOC/HAP from Catalyst Use	**0.19**	**0.14**

** Potential solvent usage is estimated to be 3x actual usage

*** Assumes 100% of the VOC/HAP is emitted

METHODOLOGY

Potential VOC (ton/year) from Coating/Printing = Maximum Coverage Area (lb ink/ MM in^2) * Weight % VOC (lb VOC/lb ink) * Maximum Line Speed (inches/min) * Maximum Press Width (inches) * Operating Schedule (hr/yr) * (1 ton/2000 lb)

Potential VOC/HAP (ton/year) from Solvent Use = Density (lb solvent/gal solvent) * Weight % VOC (or HAP) (lb VOC/lb solvent * Potential Usage (gal solvent/month) * 12 month/yr * (1 ton/2000 lb)